

DJS:sr

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA ) CASE NO. 00-6037-Cr-ZLOCH  
 ) Magistrate Judge  
v. )  
 )  
SAUL JACKSON )  
 )  
Defendants )  
-----)

GOVERNMENT'S RESPONSE TO  
THE STANDING DISCOVERY ORDER

The United States hereby files this response to the Standing Discovery Order. This response also complies with Local Rule 88.10 and Federal Rule of Criminal Procedure 16, and is numbered to correspond with Local Rule 88.10.

A. 1. The government is unaware of any written or recorded statements made by the defendant, except those attached to this response and incorporated herein by response.

2. The following is the substance of an oral statement made by the defendant before or after arrest by a person then known to the defendant to be a government agent, which the government intends to use at trial.

Defendant indicated that he was going to use the entry stamp device for an advertisement for his "furniture business."

3. The defendant did not testify before the Grand Jury.
4. The NCIC record of the defendant, if any exists, will be made available upon receipt by this office.

*[Signature]*  
14

5. Books, papers, documents, photographs, tangible objects, buildings or places which the government intends to use as evidence at trial to prove its case in chief, or were obtained or belonging to the defendant may be inspected at a mutually convenient time at the Office of the United States Attorney, 500 E. Broward Blvd., Suite 700, Ft. Lauderdale, Fl 33394. Please call the undersigned to set up a date and time that is convenient to both parties. The undersigned will tentatively set the date for Friday, March 3, 2000 at 11:00 a.m.. Please call the undersigned with 48 hours notice if you intend to review the evidence at this date and time.

The attachments to this discovery response are not necessarily copies of all the books, papers, documents, etc., that the government may intend to introduce at trial.

6. There were no physical or mental examinations or scientific tests or experiments made in connection with this case, except as attached to this response.

B. DEMAND FOR RECIPROCAL DISCOVERY: The United States requests the disclosure and production of materials enumerated as items 1, 2 and 3 of Section B of the Standing Discovery Order. This request is also made pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure.

C. The government will disclose any information or material which may be favorable on the issues of guilt or punishment within the scope of Brady v. Maryland, 373 U.S. 83 (1963), and United States v. Agurs, 427 U.S. 97 (1976).

D. The government will disclose any payments, promises of immunity, leniency, preferential treatment, or other inducements made to prospective government witnesses, within the scope of Giglio v. United States, 405 U.S. 150 (1972), or Napue v. Illinois, 360 U.S. 264 (1959).

E. The government will disclose any prior convictions of any alleged co-conspirator, accomplice or informant who will testify for the government at trial.

F. The government is not aware of any photo, line-up, show up or similar identification procedure.

G. The government has advised its agents and officers involved in this case to preserve all rough notes.

H. The government will timely advise the defendant of its intent, if any, to introduce during its case in chief proof of evidence pursuant to F.R.E. 404(b). You are hereby on notice that all evidence made available to you for inspection, as well as all statements disclosed herein or in any future discovery letter, may be offered in the trial of this cause, under F.R.E. 404(b) or otherwise (including the inextricably-intertwined doctrine).  
In addition, the government may introduce under Rule 404(b) evidence underlying the defendant's past criminal activity that has resulted in arrests and/or convictions and which is summarized in the attached court documents or others which may be provided at a later date.

I. N/A

J. The government has ordered transcribed the Grand Jury testimony of all witnesses who will testify for the government at the trial of this cause.

K. No contraband is involved in this indictment, except the seized stamp device which may be viewed at a mutually convenient time at the U.S. Attorney's Office, Ft. Lauderdale, Florida.

L. The government does not know of any automobile, vessel, or aircraft allegedly used in the commission of this offense that is in the government's possession.

M. The government is not aware of any latent fingerprints or palm prints which have been identified by a government expert as those of the defendant.

N. N/A

O. N/A

P. N/A

The government is aware of its continuing duty to disclose such newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules of Criminal Procedure, Brady, Giuglio, Napue, and the obligation to assure a fair trial.

In addition to the request made above by the government pursuant to both Section B of the Standing Discovery Order and Rule 16(b) of the Federal Rules of Criminal Procedure, in accordance with Rule 12.1 of the Federal Rules of Criminal Procedure, the government hereby demands Notice of Alibi defense; the approximate time, date, and place of the offense was:

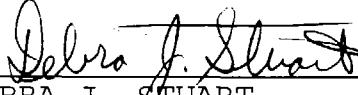
Time: At approximately 4:45 p.m.  
Date: January 31, 1999  
Place: In and near Andrews Avenue/Progresso Dr.,  
Ft. Lauderdale, Florida

The attachments to this response are numbered pages 1 - 12. Please contact the undersigned Assistant United States Attorney if any pages are missing.

Respectfully submitted,

THOMAS E. SCOTT  
UNITED STATES ATTORNEY

By:

  
\_\_\_\_\_  
DEBRA J. STUART  
Assistant United States Attorney  
Court No. 5500061  
500 E. Broward Blvd., 7<sup>th</sup> Flr  
Ft. Lauderdale, Fl 33394  
Tel: (954) 356-7255  
Fax: (954) 356-7336

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was hand delivered 23rd day of February, 2000 to: Patrick Hunt, AFPD, 101 N.E. 3<sup>rd</sup> Avenue, Ft. Lauderdale, Fl 33301.

  
\_\_\_\_\_  
DEBRA J. STUART  
Assistant United States Attorney

## STOM STAMP ORDER FORM

ORDER DATE EDA SKU # PAGE CONTROL NUMBER

1-20 5575 4475 L of 4870293-70

S OFFICE DEPOT #220 10800220  
 T 1590 NORTH FEDERAL HWY  
 O FORT LAUDERDALE FL 33304  
 R 954-563-0646  
 E

blvdr@webtv.net

## 5. INK COLOR\*:

Black  Blue  Green  Magenta  Blue / Red  
 (Select One)

\* If no color is selected, black ink will be given

6. If the text will not fit, do you want us to  
reduce the letter size to fit selected size or go  
to the next larger stamp at an extra cost?

Reduce Text Size  Larger Stamp

## IMPORTANT:

- For logos or graphic art-work, mail in camera-ready image with at least 300 dpi resolution
- Signatures must be signed with black felt-tip pen on white, unlined paper and must be mailed in.

Is this a REDO?  YESFax this original PO with YES shaded,  
and give REASON in Special Instructions  
Area.7. Logo?  YES Border Around Text?  YES Internal Use Only: TYPESET 

		<b>BRADLEY SPECIALTIES, INC.</b> <b>831 N.E. 2nd Avenue</b> <b>Ft. Lauderdale, FL 33304</b>	
		<b>REPUBLICA DE</b> <b>VENEZUELA.</b> <b>CONSEJERIA CONSULAR, PARIS</b>	
<b>ACCESORY</b> <span style="float: right;">RETAIL PRICE \$</span>			

\* and state "See Page 2" in Special Instructions Write this form's Control Number and Store ID at the top of Page 2.



**SPECIALTIES INC.**

1 N.E. 2nd AVENUE  
UDERDALE, FL. 33304  
DNE (954) 763-4859

INVOICE NO.

2000000

DATE

2000-02-27

YOUR P.O. NO.

TO  
S  
F SAUL JACKSON  
P 532-9865  
T  
ENGLEWOOD, NJ 07631

REFERENCE #

C440-VIA COURIER-DTE-PUR

DESCRIPTION	UNIT PRICE	EXTENDED PRICE
-------------	------------	----------------

57 RICHARDSON NO RETURNS	16.00	24
/COPY		
MERCHANDISE NO RETURNS	1.63	1

1	SUB TOTAL	25.46
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NET 30

SALES TAX	1.71
TOTAL DUE	30.17

PLEASE PROOFREAD ALL STAMP  
IMMEDIATELY. ANY CLAIMS FOR

FEB 03 2000

OVER DATE NOT BE HONORED  
AFTER THE ABOVE DATE.

4054 8105 0053 8818		5810924	
DO NOT CIRCLE EXPIRATION DATE 10/01		USE BOX BELOW	
<b>PRESS FIRMLY - USE BALL POINT PEN</b>			
<b>SAUL JACKSON</b>			
<b>EXPIRATION</b>			
<input checked="" type="checkbox"/> DATE CHECKED			
QUAN.	CLASS	DESCRIPTION	PRICE
1		One stamp	21.50
1		One to 4 stamp	20.60
1		#0 red pad	3.10
1		#2 blue pad	5.75
DATE 1-24-00		AUTHORIZATION 898169	SUB TOTAL 50.95
REFERENCE NO.		REG'D.	TAX
FOLIO/CHECK NO.		SERVER	CLERK
			11PS MISG
			3.06
PURCHASER SIGN HERE <i>X</i>		SALES SLIP	
#005		TOTAL 54.01	
Cardholder acknowledges receipt of goods and/or services in the amount of the total charge, knows and agrees to perform the obligations set forth in the Cardholder's agreement with the issuer.			
MERCHANT COPY			

0004





4954 3100 0053 8818

5811557

J. POLYMER SCIENCE: PART A

ADLY SPECIALTIES INC  
T LAUREL AL FL

23 20 4464 992

**PURCHASER SIGN HERE**

Cardholder acknowledges receipt of goods and/or services in the amount of the Total shown herein and agrees to perform the obligations set forth in the Cardholder's agreement with the lessor.

BANK COPY

4054 8100 0053 8818

5811557

10/01/V

SAUL JACKSON

SHADLEY SPECIALTIES INC  
FT LAUDERDALE FL

23 20 4464 992

**PURCHASER SIGN HERE**

X.

**Cardholder acknowledges receipt of goods and/or services in the amount of the Total shown herein and agrees to perform the obligations set forth in the Cardholder's agreement with the Issuer.**

**IMPORTANT: RETAIN THIS COPY FOR YOUR RECORDS**

0007

CUSTOMER COPY

**BRADLEY SPECIALTIES, INC.**  
831 N.E. 2nd Avenue  
Fort Lauderdale, FL 33304  
(954)763-4859 Fax (954) 763-1348  
1-800-624-2514 Fax 800-851-9416

46321

Customer's  
Order No. \_\_\_\_\_ DATE 1-26 2000

DATE 1-26 2000

SOLD TO Sant Jackson  
ADDRESS

ADDRESS \_\_\_\_\_

SALESMAN 523-8865 TERMS

CASH	CHARGE	C. O. D.	PAID OUT	RETD. MDSE.	RECD. ON ACCT.
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**ALL Claims and Returned Goods MUST Be Accompanied By This Bill**

**SIGNATURE** \_\_\_\_\_

0008

U.S. IMMIGRATION  
060 MIA-IAP 1255

JAN 29 2000

ADMITTED \_\_\_\_\_  
UNTIL

## Inventory of vehicle

1/31/00  
5PM

1 pr tennis shoes  
 2 camera film + trap  
 metal beading  
 Xtra laundry detergent  
 windshield washer solvent  
 Minolta flash meter(?)  
 Rope  
 Wax  
 Engine fluids  
 paintbrush  
 umbrella  
 2 Atlas  
 cloth  
 owners manual  
 scarf  
 3 polishing rags  
 registration  
 Febreeze  
 2 moisture lotion  
 sunblock  
 various maps  
 flashlight  
 sinus caplets  
 cooler  
 various audio tapes  
 sunglasses  
 off insect spray

SA Rick Bencel  
SA Ron Crawford

SA Ron Crawford



